

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

IN RE: THE MATTER OF	)	
	)	
RANDALL JOE MURDOCK and	)	CASE NO. 14-07479-RLM
AMY ANN MURDOCK	)	CHAPTER 13
	)	
DEBTORS	)	
-----	)	
RANDALL JOE MURDOCK and,	)	
AMY ANN MURDOCK	)	
PLAINTIFFS,	)	ADV. PROC. NO. 14-50151
	)	
v.	)	
	)	
PARTNERS FOR PAYMENT RELIEF, LLC	)	
	)	
DEFENDANTS.	)	

**AGREED CONSENT TO JUDGMENT ON COMPLAINT OF DEBTORS PURSUANT  
TO 11 U.S.C. SECTION 506 (a) AND BANKRUPTCY RULE 3012 TO DETERMINE  
VALUE OF SECURITY AND CREDITOR'S ALLOWED SECURED CLAIM**

Plaintiffs Randall Joe Murdock and Amy Ann Murdock, represented by John B. LaRue, and Defendant, Partners for Payment Relief, LLC through its Attorney, Timothy J. O'Connor, hereby stipulate as follows:

**RECITALS**

1. On or about August 12, 2014, Plaintiffs filed for relief under Chapter 13 of the Bankruptcy Code.
2. That Plaintiffs filed their Complaint of Debtors Pursuant to 11 U.S.C. Section 506 (a) and Bankruptcy Rule 3012 to Determine Value of Security and Creditor's Allowed Secured Claim on August 14, 2014.

3. By agreement of the parties, Partners for Payment Relief, LLC's mortgage on the above-mentioned real property located at 400 N. Bittersweet, Muncie, IN 47304 with a legal description as follows: Lot Number Twenty-five (25) and the North half (N ½) of Lot numbered Twenty-six (26) in Western Ridge, an addition to the City of Muncie, Indiana, a plat of which is recorded in Plat Book 7, Page 59, of the Records of Plats of Delaware County, Indiana. Being the same property conveyed to Randall J. Murdock and Amy A. Murdock, husband and wife, by deed dated August 19, 1996, and recorded September 4, 1996, in Volume 1996, Page 5031, as Instrument No. 15337, in the Office of the Recorder of Delaware County, Indiana shall be rendered null and void, the Debtors shall record a copy of the Agreed Consent or Order of Judgment in the Miscellaneous Records of Delaware County Recorder's office as proof that Partners for Payment Relief, LLC's second mortgage is rendered null and void.

4. That the allowed secured claim, if any, of the Defendant, Partners for Payment Relief, LLC, hereby has no value and is allowed only as an unsecured claim against debtors' estate.

/s/ Timothy J. O'Connor

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